REMARKS

Claims 1-3, 5-9, 11-18, 20-26, 28, 30-32, and 34-37 are all the claims pending in the application. Claims 1, 8, 13, 22, 28, and 30 are the independent claims.

By this Amendment, Applicants amend claims 2, 6, 8, 9, 11, 12, 13, 14, 18, 22, 30, and 37 to better conform them to U.S. patent practice.

Claim Objections

The Examiner has objected to claims 11, 12, and 22 due to various informalities (Office Action, page 2, paragraph 2). The informalities noted by the Examiner have been corrected. Accordingly, Applicants respectfully request withdrawal of the claim objections.

Claim Rejections – 35 U.S.C. § 112

Claims 8, 9, 11-18, 20-26, 30-32, and 34 are rejected under 35 U.S.C. § 112, second paragraph as allegedly being indefinite. The rejection of these claims relates to antecedent basis issues in claims 8, 13, 22, and 30. By this Amendment, Applicants have amended these claims to resolve the antecedent basis issues. Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. § 112 rejection.

Claim Rejections – 35 U.S.C. § 103

Claims 1-3, 5, 6, 8, 9, 11-16, 18, 20-26, 28, 30-32, and 34-36 are rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Iverson (U.S. Patent No. 6,957,075) in view of Zancho (U.S. Patent No. 5,814,798). Claims 7 and 17 are rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Iverson in view of Zancho, and further in view of Nakajima (U.S. Patent No. 7,095,456). Claim 37 is rejected under 35 U.S.C. 103(a) as allegedly being

unpatentable over Iverson in view of Zancho, and further in view of Miller *et al.* (U.S. Pub. No. 2003/0046557, hereinafter "Miller").

For *at least* the following reasons, Applicants respectfully traverse these rejections.

Applicants respectfully submit that even if the teachings of Iverson and Zancho were combined, the combined teachings would not teach or suggest all the features of claim 1. For example, claim 1 is directed to a user interface (UI) support apparatus. The UI support apparatus comprises, *inter alia*, a UI support module. The UI support module is operable to:

- store input/output modules as stored input/output modules, wherein the stored input/output modules are selected corresponding to conditions of respective users, in an input/output module storing unit,
- search the input/output module storing unit for a specific input/output module of one of the respective users,
- execute the specific input/output module, and
- support a UI meeting a condition of the one of the respective users.

Moreover, the UI support module comprises an input/output module selecting unit and a data format determining unit. The input/output module selecting unit includes a mapping of each of the respective users with corresponding at least one of the stored input/output module. The data format determining unit determines whether a searched input/output module provided by the input/output module selecting unit can process a type of data of the UI support module, through a table where the input/output modules and data formats that can be processed in respective input/output modules of the table are mapped.

In the Office Action, it is asserted that Zancho's col. 1, lines 10-12, col. 2, lines 31-45, col. 9, lines 49-55, col. 10, line 48 to col. 11, line 16, along with FIG. 14 teach the above-noted, claimed data format determining unit (Office Action, page 5, last paragraph continuing to top of page 7, and page 34, paragraph no. 39). Applicants respectfully disagree.

For example, Zancho is directed to providing a donor device (e.g., a portable memory card or a database that can be accessed via a network) which maintains a user's preferences corresponding to multiple application devices (e.g., a cell phone, computer, or a car) used by the user (Zancho, col. 2, lines 31-48). The donor device is accessed by the application devices to learn desired "preferences" corresponding to a subject user so these preferences can be implemented on the application device (e.g., display settings on a phone or computer, or mirror and steering wheel adjustments in a car, see discussion in col. 1, lines 20-60 of Zancho). In Zancho's donor device, the user's preferences are stored as a multi-dimensional reference selection matrix 805 as illustrated in Zancho's FIG. 11. In particular, the reference selection matrix 805 includes the application device axis 820 which includes the various application devices (Zancho, col. 7, lines 18-26), the human senses axis 810 which includes the various types of user interface modes (Zancho, col. 6, lines 49-62), and the environment axis 830 which includes the different environments in which the application devices (in axis 320) can be operated (Zancho, col. 7, lines 27-39).

With reference to col. 10 and FIG. 14 of Zancho, the Examiner contends that "**[w]hen new preferences are needed for an application device, a donor device is searched** [figure 14, 905]. If a donor device is found, a determination is made as to which categories of preferences [*sic*] between the donor device and the appliance [figure 14, 915]. This is made using a reference [*sic*] selection matrix for the particular donor device…" (Office Action, page 35, lines 1-5, emphasis added where **bold**). Applicants respectfully submit that the Examiner's above-noted statement is based on a misunderstanding and/or mischaracterization of Zancho's disclosure. For instance, the cited portion in Zancho (i.e., the description corresponding to FIG. 14) relates to adding new preferences to the aforementioned preference selection matrix when a

new application is loaded onto an application device (Zancho, col. 10, lines 6-15). When a new application is loaded, Zancho discloses that the subject application device (on which the new application is loaded) sends to the donor device components of a preference selection vector which correspond to a newly added application (col. 10, lines 52-61, "[t]he application device sends to the donor device in block 916 the preference selection vector containing, for example, a human senses code indicative of needed human senses attributes, an environment code indicative of the environment desired....").

Therefore, contrary to the Examiner's assertions, the cited portions of Zancho do not teach that a donor device is "searched" when "new" preferences are needed for an application device. Rather, the Zancho's cited portions (in relation to FIG. 14) disclose that when a new application is loaded on an application device, preferences related to the newly loaded application are transmitted from the application device to the donor device for storage in the preference selection matrix (e.g., the preference selection matrix shown in Zancho's FIG. 11). For *at least* this reason, Applicants respectfully submit that Zancho cannot and does not teach any data format determining unit which determines whether a searched input/output module (allegedly the preferences corresponding to an application/application device) provided by the input/output module selecting unit (allegedly the donor device) can process a type of data of the UI support module (allegedly the donor device). There is no preference selection vector that is provided by Zancho's donor device to the application device on which preference selection vector such a verification is carried out.

Moreover, the Examiner contends that "[s]ince new models of equipment may be encountered by the user, only those preferences that are compatible with the new models will be selected" (Office Action, page 35, lines 6-8). To this, Applicants respectfully submit that in

Zancho, there is no mapping of preference selection vectors with data formats that can be processed in the respective preference selection vectors. Moreover, the claim recites determining whether a searched input/output module provided by the input/output module selecting unit can process a type of data of the UI support module. Based on the Examiner's rationale noted above, only preferences that are compatible are selected, that is, selected preferences (corresponding closest to the claimed searched input/output module) are not tested for compatibility. This is simply because there is no data compatibility testing carried out in Zancho after a preference selection vector is selected for an application device, since all the preference selection vectors (which were transmitted from an application device to the donor device) would be compatible with the subject application device.

As acknowledged by the Examiner, Iverson does not cure the above-noted deficiencies of Zancho (Office Action, page 5, last line to page 6, line 6). Accordingly, Applicants respectfully submit that the combined teachings of Iverson and Zancho do not teach the above-noted features of claim 1.

Independent claims 8, 13, 22, 28, and 30 recite features similar to those discussed above with respect to claim 1. Therefore, Applicants respectfully submit that claims 8, 13, 22, 28, and 30 are patentable for *at least* reasons similar to those given above with respect to claim 1.

The dependent claims, namely claims 2, 3, 5, 6,, 9, 11, 12, 14-16, 18, 20, 21, 23-26, 31, 32, and 34-36, are patentable *at least* by virtue of their dependencies.

Claims 7 and 17 depend from claims 1 and 13, respectively. Since Nakajima does not cure the deficient teachings of Iverson and Zancho with respect to claims 1 and 13, claims 7 and 17 are patentable *at least* by virtue of their dependency.

Claim 37 depends from claim 1. Since Miller does not cure the deficient teachings of Iverson and Zancho with respect to claim 1, claim 37 is patentable *at least* by virtue of its dependency.

New Claims

New claims 38 and 39 are patentable *at least* by virtue of their dependency[1]. Furthermore, the prior art of record does not teach or suggest that in the mapping included in the input/output module selecting unit, the one of the respective users is mapped to a plurality of the stored input/output modules, and the mapping includes a priority order in which the one of the respective users desires selection of the plurality of the stored input/output modules, and the input/output module selecting unit selects a first input/output module, among the plurality of the stored input/output modules, based on the priority order, as set forth in claim 38. Neither Zancho nor Iverson teach or suggest selection of preferences/personalities based on a priority order included in a mapping, as set forth in claim 38.

Similarly, the combined teachings of Zancho and Iverson do not teach or suggest a data format determining unit which determines whether the first input/output module can process the type of data supported by the UI support module, and if the first input/output module cannot process the type of data supported by the UI support module, the input/output module selecting unit selects a second input/output module, among the plurality of the input/output modules, based on the priority order, wherein the data format determining unit determines whether the second input/output module can process the type of data supported by the UI support module, and the UI support module executes, in response to a result received from the data format

[1] The new claims are supported by *at least* paragraphs [60]-[62] on page 16 of the Specification.

determining unit, an input/output module corresponding to the one of the respective users, as set forth in claim 39. Since Iverson and Zancho do not even teach a priority order, as claimed, they cannot teach determining whether the selected preferences/personalities can process the type of data supported by a UI support module with respect to the priority order, as claimed.

Conclusion

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

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